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Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA, ) CASE NO. 4:23-CR-00267 JSW  
Plaintiff, )  
v. ) JOINT STATUS REPORT AND STIPULATION TO  
TIMOTHY ALLEN MANLY WILLIAMS, ) CONTINUE STATUS CONFERENCE;  
Defendant. ) ~~[PROPOSED]~~ ORDER

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UNITED STATES OF AMERICA, ) CASE NOS. 4:23-CR-00268 JSW-1  
Plaintiff, ) 4:24-CR-00502 JSW  
v. ) JOINT STATUS REPORT AND STIPULATION TO  
DANIEL JAMES HARRIS, ) CONTINUE STATUS CONFERENCE;  
Defendant. ) ~~[PROPOSED]~~ ORDER

## **STIPULATION AND ~~PROPOSED~~ ORDER**

UNITED STATES OF AMERICA, ) CASE NO. 4:23-CR-00269 JSW-2  
Plaintiff, )  
v. ) JOINT STATUS REPORT AND STIPULATION TO  
ERIC ALLEN ROMBOUGH, ) CONTINUE STATUS CONFERENCE;  
Defendant. ) ~~[PROPOSED]~~ ORDER

Each of the above-captioned cases are set for status conference hearings on August 19, 2025.

9 Defendant Timothy Allen Manly Williams pleaded guilty to destruction, alteration, and  
10 falsification of records in federal investigations; obstruction of official proceedings; and deprivation of  
11 rights under color of law on November 28, 2023. Defendant Manly Williams testified in *United States*  
12 *v. Morteza Amiri*, Case No. 23-CR-269 JSW-1 in March 2025.

13       Defendant Daniel James Harris pleaded guilty to conspiracy to distribute anabolic steroids;  
14 possession of anabolic steroids with the intent to distribute; and attempted possession of anabolic  
15 steroids with the intent to distribute in case number 23-CR-00268; and pleaded guilty to bank fraud in  
16 case number 24-CR-00502; on September 17, 2024. Defendant Harris testified in *United States v.*  
17 *Devon Wenger*, Case No. 23-CR-268 JSW-2 in April 2025.

18 Defendant Eric Allen Rombough pleaded guilty to conspiracy against rights and deprivation of  
19 rights under color of law on January 14, 2025. Defendant Rombough testified in *United States v.*  
20 *Morteza Amiri*, Case No. 23-CR-269 JSW-1 in March 2025.

21 Since the setting of the August 19, 2025 status conference hearings, the retrial in *United States v.*  
22 *Devon Wenger*, Case No. 23-CR-269 JSW-3 has been continued to September 8, 2025. Accordingly,  
23 the parties in the above-captioned cases are not yet ready to set sentencing hearings and the parties  
24 stipulate and agree that, with the Court's permission, the currently-scheduled status conference hearings  
25 be continued to October 7, 2025 for further status on sentencing.

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## STIPULATION AND PROPOSED ORDER

The undersigned Assistant United States Attorney certifies that he has obtained approval from the undersigned to file this stipulation and proposed order.

## **IT IS SO STIPULATED.**

DATED: July 29, 2025

/s/ Eric Cheng  
ERIC CHENG  
ALETHEA SARGENT  
ALEXANDRA SHEPARD  
Assistant United States Attorneys

/s/ \*via email 7/29/25

/s/ \*via email 7/29/25  
JAMES P. VAUGHNS  
Counsel for Defendant DANIEL JAMES HARRIS

/s/ \*via email 7/29/25

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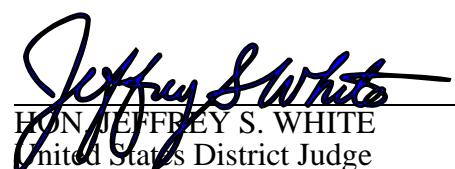
ANTHONY BRASS  
Counsel for Defendant ERIC ALLEN  
ROMBOUGH

1                   **[PROPOSED] ORDER**

2       Based upon the facts and representations set forth in the stipulation of the parties, and good cause  
3 shown, IT IS HEREBY ORDERED that the status conference hearings currently set for August 19, 2025  
4 in each of the above-captioned matters be continued to **October 7, 2025, at 1:00 p.m.** for further status  
5 on sentencing. The parties shall file updated joint status reports, or stipulations to request to continue  
6 the status conference hearings, by September 30, 2025.

7                   **IT IS SO ORDERED.**

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9                   DATED: July 29, 2025

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HON. JEFFREY S. WHITE  
United States District Judge